

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THE OFFICIAL STANFORD INVESTORS COMMITTEE; and PHILIP A. WILKINSON, and HORACIO MENDEZ, individually and on behalf of a class of all others similarly situated,

Plaintiffs,

Case No. 3:11-cv-0329-N

vs.

ADAMS AND REESE, LLP; JAMES AUSTIN; BREAZEALE, SACHSE & WILSON, LLP; CLAUDE REYNAUD; J.D. PERRY; REBECCA HAMRIC; MICHAEL CONTORNO; LOUIS FOURNET; JAY COMEAUX; CORDELL HAYMON; THOMAS FRAZER; ZACK PARRISH; DANIEL BOGAR; and JASON GREEN,

Defendants.

RALPH S. JANVEY, IN HIS CAPACITY AS COURT-APPOINTED RECEIVER FOR THE STANFORD RECEIVERSHIP ESTATE, AND THE OFFICIAL STANFORD INVESTORS COMMITTEE

Plaintiffs,

Case No. 3:12-CV-495-N-BG

vs.

ADAMS & REESE, LLP; BREAZEALE, SACHSE & WILSON, LLP; ROBERT SCHMIDT; JAMES AUSTIN; CLAUDE F. REYNAUD, JR.; CORDELL HAYMON; THOMAS FRAZER

Defendants.

**AMENDED STIPULATION AND [PROPOSED] ORDER WITH
NOTICE OF SETTLEMENT AND BAR ORDER PROCEEDINGS**

PLEASE TAKE NOTICE that Ralph S. Janvey, in his capacity as Court-appointed Receiver for the Stanford Receivership Estate (the “**Receiver**”), The Official Stanford Investors Committee (“**OSIC**”), Philip A. Wilkinson and Horacio Mendez (“**Named Plaintiffs**” and, together with the Receiver and OSIC, “**Plaintiffs**”) have entered into an Amended Stipulation and Settlement Agreement settling all claims in the above-captioned actions (the “**Settlement**”) against Adams and Reese LLP, Robert C. Schmidt (“**Schmidt**”) and James R. Austin (“**Austin**” and, together with A&R and Schmidt, the “**A&R Parties**”), Breazeale, Sachse & Wilson, LLP and Claude F. Reynaud, Jr. (“**Reynaud**”), but, as to Reynaud, only those limited claims as set forth and defined in the Settlement (collectively “**BSW**”), Cordell Haymon (“**Haymon**”) and Lynnette B. Frazer, Individually and as Independent Executrix of the Estate of Thomas L. Frazer (“**Frazer**”). The Receiver, the OSIC, Named Plaintiffs, the A&R Parties, BSW, Haymon and Frazer are referred to in this document as the “**Settling Parties**.”

PLEASE TAKE FURTHER NOTICE that Plaintiffs have filed a Motion For Order Approving Proposed Settlement with Adams & Reese LLP, BSW, Cordell Haymon And Lynette Frazer and for Entry of Bar Order, Approving Notice and Entry of Scheduling Order, and Approving Attorneys’ Fees (the “**Motion to Approve**”) in the action captioned *SEC v. Stanford Int’l Bank, Ltd.*, No. 3:09-cv-0298-N (N.D. Tex.) (the “**Receivership Action**”). Copies of the Motion to Approve and supporting papers may be obtained from the Court’s docket in the Receivership Action (ECF No. 2134) and are also available on the official website of the Receiver (<http://www.stanfordfinancialreceivership.com>).

IT IS FURTHER STIPULATED AND AGREED, by and among the Settling Parties, that all proceedings in the above-captioned actions against the A&R Parties, BSW, Haymon, and Frazer shall be stayed pending disposition of the Motion to Approve, with the limited exception

of proceedings relating to deposition of Haymon in Case No. 3:11-cv-0495-B. This stay shall not apply to Plaintiffs claims against Reynaud that are not specifically released in the Settlement, and which shall continue without regard to the pending Motion to Approve the Settlement.

Dated: May 18, 2015

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SO ORDERED this _____ day of _____ 2015

UNITED STATES DISTRICT JUDGE